

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE:

LA FUNDADORA, INC.

DEBTOR

IN RE:

**JUAN MIGUEL MUÑOZ ROLDAN
PATRICIA YVONNE GALINDEZ MATOS**

DEBTORS

CASE NO. 09-05820 SEK

CHAPTER 12

CASE NO. 09-05822 SEK

CHAPTER 12

MOTION TO AMEND SCHEDULE B

TO THE HONORABLE COURT:

COME NOW Debtors through the undersigned attorney and respectfully request and pray for the following:

1. On July 15, 2009 Debtors La Fundadora, Inc. and; Juan Miguel Muñoz Roldán and Patricia Yvonne Galindez Matos, filed voluntary petitions for relief pursuant chapter 12 of the Bankruptcy Code, 11 U.S.C. §1201 et.seq.
2. On August 18, 2009, the captioned cases were consolidated by this Honorable Court.
3. Debtors through this motion are amending the Schedule B to correct the farm supplies.
4. Debtors respectfully request this Honorable Court to take notice of this amended Schedule B.

WHEREFORE, Debtors request this Honorable Court to take notice of this motion with any other procedure that in accordance to law this Honorable Court

deems just and proper.

I HEREBY CERTIFY that a copy of this motion has been electronically filed with the Clerk of the Bankruptcy Court using CM/ECF which will forward a copy of the same to: José R. Carrion Morales, Chapter 12 Trustee and all other parties in interest.

In Caguas, Puerto Rico, this 1st day of September, 2009.

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Isa M. Gratacós- Padró
/s/ Isa M. Gratacós- Padró (221209)

IN RE LA FUNDADORA, INC

Case No. 09-05820-12

Debtor(s)

(If known)

SCHEDULE B - PERSONAL PROPERTY

Except as directed below, list all personal property of the debtor of whatever kind. If the debtor has no property in one or more of the categories, place an "x" in the appropriate position in the column labeled "None." If additional space is needed in any category, attach a separate sheet properly identified with the case name, case number, and the number of the category. If the debtor is married, state whether the husband, wife, both, or the marital community own the property by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the debtor is an individual or a joint petition is filed, state the amount of any exemptions claimed only in Schedule C - Property Claimed as Exempt.

Do not list interests in executory contracts and unexpired leases on this schedule. List them in Schedule G - Executory Contracts and Unexpired Leases.

If the property is being held for the debtor by someone else, state that person's name and address under "Description and Location of Property." If the property is being held for a minor child, simply state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m).

| TYPE OF PROPERTY | NONE | DESCRIPTION AND LOCATION OF PROPERTY | HUSBAND, WIFE, JOINT, OR COMMUNITY | CURRENT VALUE OF DEBTOR'S INTEREST IN PROPERTY WITHOUT DEDUCTING ANY SECURED CLAIM OR EXEMPTION |
|---|------|--|------------------------------------|---|
| 1. Cash on hand. | | CASH ON HAND | C | 100.00 |
| | | CASH ON HAND OF DEBTORS JUAN M. MUÑOZ & PATRICIA GALINDEZ, CONSOLIDATED CASE 09-05822 SEK-12. | J | 10.00 |
| 2. Checking, savings or other financial accounts, certificates of deposit or shares in banks, savings and loan, thrift, building and loan, and homestead associations, or credit unions, brokerage houses, or cooperatives. | | CHECKING ACCOUNT AT BANCO SANTANDER ACCOUNT NUMBER 3003017116 | C | 40.00 |
| | | CHECKING ACCOUNT AT BANCO SANTANDER USE TO PAY MORTGAGE ACCOUNT NUMBER 3003038873 | C | 100.00 |
| | | CHECKING ACCOUNT AT BBVA ACCOUNT NUMBER 00431750410797. FROM DEBTORS JUAN M. MUÑOZ AND PATRICIA Y. GALINDEZ, CONSOLIDATED CASE NO. 09-05822 SEK-12. | J | 257.30 |
| | | CHECKING ACCOUNT AT WESTERNBANK # 001601022541. ACCOUNT CLOSED. FROM DEBTORS JUAN M. MUÑOZ & PATRICIA GALINDEZ, CONSOLIDATED CASE NO. 09-05822 SEK-12 | J | 0.00 |
| | | COMMERCIAL CHECKING ACCOUNT AT SCOTIABANK ACCOUNT NUMBER 265181 | C | 50.00 |
| | | SAVINGS ACCOUNT AT BANCO POPULAR ACCOUNT NUMBER 479-338036. FROM DEBTORS JUAN M. MUÑOZ AND PATRICIA Y. GALINDEZ, CONSOLIDATED CASE NO. 09-05822 SEK-12. | J | 1.00 |
| 3. Security deposits with public utilities, telephone companies, landlords, and others. | | UTILITY BOND. PERSONAL. FROM DEBTORS JUAN M. MUÑOZ AND PATRICIA Y. GALINDEZ, CONSOLIDATED CASE NO. 09-05822 SEK-12. | W | 100.00 |
| | | UTILIY BOND AEE | C | 1,000.00 |
| 4. Household goods and furnishings, include audio, video, and computer equipment. | | TWO REFRIGERATORS, STOVE, MICROWAVE, DINING AND LIVING ROOM SET, THREE BEDROOM SET, THREE FAN, THREE A/C, TWO RADIO, TWO TV, COMPUTER WITH DESK, LAPTOP, WASHING AND DRYER MACHINE, PRINTER, SCANNER, TRADE. PERSONAL. FROM DEBTORS JUAN M. MUÑOZ AND PATRICIA Y. GALINDEZ, CONSOLIDATED CASE NO. 09-05822 SEK-12. | J | 2,000.00 |
| 5. Books, pictures and other art objects, antiques, stamp, coin, record, tape, compact disc, and other collections or collectibles. | X | | | |

IN RE LA FUNDADORA, INC

Case No. 09-05820-12

Debtor(s)

(If known)

SCHEDULE B - PERSONAL PROPERTY
(Continuation Sheet)

| TYPE OF PROPERTY | N O N E | DESCRIPTION AND LOCATION OF PROPERTY | HUSBAND, WIFE, JOINT, OR COMMUNITY | CURRENT VALUE OF DEBTOR'S INTEREST IN PROPERTY WITHOUT DEDUCTING ANY SECURED CLAIM OR EXEMPTION |
|---|------------------|--|---------------------------------------|--|
| 6. Wearing apparel. | | HOUSE AND WEARING APPAREL. PERSONAL. FROM DEBTORS JUAN M. MUÑOZ AND PATRICIA Y. GALINDEZ, CONSOLIDATED CASE NO. 09-05822 SEK-12. | J | 600.00 |
| 7. Furs and jewelry. | | FINE AND FANTASY JEWELRY. PERSONAL. FROM DEBTORS JUAN M. MUÑOZ AND PATRICIA Y. GALINDEZ, CONSOLIDATED CASE NO. 09-05822 SEK-12. | J | 300.00 |
| 8. Firearms and sports, photographic, and other hobby equipment. | X | | | |
| 9. Interest in insurance policies. Name insurance company of each policy and itemize surrender or refund value of each. | X | | | |
| 10. Annuities. Itemize and name each issue. | X | | | |
| 11. Interests in an education IRA as defined in 26 U.S.C. § 530(b)(1) or under a qualified State tuition plan as defined in 26 U.S.C. § 529(b)(1). Give particulars. (File separately the record(s) of any such interest(s). 11 U.S.C. § 521(c).) | X | | | |
| 12. Interests in IRA, ERISA, Keogh, or other pension or profit sharing plans. Give particulars. | X | | | |
| 13. Stock and interests in incorporated and unincorporated businesses. Itemize. | X | | | |
| 14. Interests in partnerships or joint ventures. Itemize. | X | | | |
| 15. Government and corporate bonds and other negotiable and non-negotiable instruments. | X | | | |
| 16. Accounts receivable. | X | | | |
| 17. Alimony, maintenance, support, and property settlements in which the debtor is or may be entitled. Give particulars. | X | | | |
| 18. Other liquidated debts owed to debtor including tax refunds. Give particulars. | X | | | |
| 19. Equitable or future interest, life estates, and rights or powers exercisable for the benefit of the debtor other than those listed in Schedule A - Real Property. | X | | | |
| 20. Contingent and noncontingent interests in estate of a decedent, death benefit plan, life insurance policy, or trust. | X | | | |

IN RE LA FUNDADORA, INC

Case No. 09-05820-12

Debtor(s)

(If known)

SCHEDULE B - PERSONAL PROPERTY
(Continuation Sheet)

| TYPE OF PROPERTY | NONE | DESCRIPTION AND LOCATION OF PROPERTY | HUSBAND, WIFE, JOINT, OR COMMUNITY | CURRENT VALUE OF DEBTOR'S INTEREST IN PROPERTY WITHOUT DEDUCTING ANY SECURED CLAIM OR EXEMPTION |
|---|------|---|------------------------------------|---|
| 21. Other contingent and unliquidated claims of every nature, including tax refunds, counterclaims of the debtor, and rights to setoff claims. Give estimated value of each. | X | | | |
| 22. Patents, copyrights, and other intellectual property. Give particulars. | X | | | |
| 23. Licenses, franchises, and other general intangibles. Give particulars. | X | | | |
| 24. Customer lists or other compilations containing personally identifiable information (as defined in 11 U.S.C. § 101(41A)) provided to the debtor by individuals in connection with obtaining a product or service from the debtor primarily for personal, family, or household purposes. | X | | | |
| 25. Automobiles, trucks, trailers, and other vehicles and accessories. | | FORD F150 2000 | C | 4,920.00 |
| | | JEEP CHEROKEE 2004. PERSONAL. FROM DEBTORS JUAN M. MUÑOZ & PATRICIA Y. GALINDEZ, CONSOLIDATED CASE NO. 09-05822 SEK-12. | J | 10,000.00 |
| | | MERCEDES 350 SEL SOLD TO THIRD PARTY. PERSONAL. FROM DEBTORS JUAN M. MUÑOZ AND PATRICIA Y. GALINDEZ, CONSOLIDATED CASE NO. 09-05822 SEK-12. | W | 0.00 |
| | | PICK UP FORD F-150 1998 | W | 3,700.00 |
| | | PERSONAL. FROM DEBTORS JUAN M. MUÑOZ & PATRICIA Y. GALINDEZ, CONSOLIDATED CASE NO. 09-05822 SEK-12. | | |
| 26. Boats, motors, and accessories. | X | | | |
| 27. Aircraft and accessories. | X | | | |
| 28. Office equipment, furnishings, and supplies. | X | | | |
| 29. Machinery, fixtures, equipment, and supplies used in business. | X | | | |
| 30. Inventory. | | MILK CUOTA 5,000 CUARTILLOS | C | 135,000.00 |
| | | MILK CUOTA (21,000) | C | 462,000.00 |
| 31. Animals. | | 10 HORSES | C | 3,000.00 |
| | | 76 COWS (\$93600), 26 RESTING COWS (\$26000), 78 CALF (\$62400), 2 BULLS (\$2500) | C | 184,500.00 |
| 32. Crops - growing or harvested. Give particulars. | X | | | |

SCHEDULE B - PERSONAL PROPERTY

(Continuation Sheet)

| TYPE OF PROPERTY | NONE | DESCRIPTION AND LOCATION OF PROPERTY | HUSBAND, WIFE, JOINT, OR COMMUNITY | CURRENT VALUE OF DEBTOR'S INTEREST IN PROPERTY WITHOUT DEDUCTING ANY SECURED CLAIM OR EXEMPTION |
|--|------|---|------------------------------------|---|
| 33. Farming equipment and implements. | | TRACTOR,TOOLS, CHOPPER, POLISH, GATES,GENERATOR,TRANSFER SWITCH, ROUND BALE CLAMP,TRIMMERS,GENERATOR,TWO SEPTIC TANK BOMB, TWO COW MILK EXTRACTION BOMB, EIGHT COW MILK EXTRACTION MACHINE, TWO WATER EXTRACTION BOMBS,THREE MILK TANK, TWO WATER TANK,TOMB SMALL CART,CLAMP TRACTOR, RUBBER PIPE, SMALL TRACTOR, PRESSURE MACHINE, SECURITY CAMARA | C | 60,000.00 |
| 34. Farm supplies, chemicals, and feed. | | COW FOOD, IODINE, CLOROX, ACID, DETERGENT, NAPKINS, COW MEDICINE | C | 2,500.00 |
| 35. Other personal property of any kind not already listed. Itemize. | X | | | |
| TOTAL | | | | 870,178.30 |

(Include amounts from any continuation sheets attached.

Report total also on Summary of Schedules.)

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continuation sheets attached